

Mr. John Collins
Avery Dennison
870 West Anderson Boulevard
Greenfield, IN 46140

Re: 059-12547
Second Administrative Amendment to
T 059-7475-00018

Dear Mr. Collins:

Avery Dennison was issued a permit on July 12, 1999 for a pressure sensitive paper coating operation. A letter requesting a significant source modification (059-12392-00018) was received on June 16, 2000. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (with new language bolded and old language stricken):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) pressure sensitive paper coating operation, constructed in October, 1994, identified as BE-1, with maximum capacity of nine hundred ninety-three (993) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
 - (A) One (1) flow coating operation and one (1) roll coating operation; and
 - (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr).
- (2) Two (2) natural gas fired boilers, constructed in October, 1994, identified as B-01 and B-02, with maximum heat input capacity of 10.205 million British thermal units per hour (mmBtu/hr) each, exhausting to two (2) stacks (B-01 and B-02).
- (3) **One (1) pressure sensitive paper coating operation, identified as GF2, with a maximum capacity of 1,500 billion square inches, exhausting to three (3) stacks (E-1, F-1, and G-1) consisting of the following equipment:**
 - (A) **Two (2) flow coating operations and one (1) roll coating operation;**
 - (B) **Two (2) natural gas fired drying ovens with a total maximum heat input capacity of 67.86 million British thermal units per hour (mmBtu/hr); and**
- (4) **One (1) natural gas fired boiler with capacity of 10.205 million British thermal units per hour (mmBtu/hr) exhausting to stack B-03.**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each;
- (2) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons;
- (3) **Eight (8) 13,000-gallon water-based emulsion adhesive tanks; and**
- (4) **One (1) 8,000-gallon waste water tank.**

C.8 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total VOC emissions from the entire source shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Compliance with this limit shall be demonstrated using the quarterly report located at the end of this permit.

SECTION D.3 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) pressure sensitive paper coating operation, identified as GF2, with a maximum capacity of 1,500 billion square inches, exhausting to three (3) stacks (E-1, F-1, and G-1) consisting of the following equipment:

Two (2) flow coating operations and one (1) roll coating operation;
Two (2) natural gas fired drying ovens with a total maximum heat input capacity of 67.86 million British thermal units per hour (mmBtu/hr); and

This facility also consists of the following insignificant activities:

Eight (8) 13,000-gallon water-based emulsion adhesive tanks;
One (1) 8,000-gallon waste water tank
One (1) 80KW capacity corona treater
One (1) 400-ton capacity cooling tower

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water, delivered to the coating applicator.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to 40 CFR 60.442, Subpart RR, when the pressure sensitive paper coating operation input Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for each calendar month.

D.3.3 New source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, no more than 0.20 kg HAP may be emitted per kg coating solids applied, as calculated on a weighted average basis for all coatings used each calendar month.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for GF2 and any control devices.

Compliance Determination Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 12]

Whenever, the input VOC usage exceeds forty-five (45) megagrams per 12 consecutive month period, the Permittee shall perform VOC testing using the method established in the test protocol. IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1, D.3.2, and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements [326 IAC 12] [40 CFR 60.116b]

(a) To document compliance with Conditions D.3.1, D.3.2, and D.3.3 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1), (2), (4), and (5) shall be taken monthly. Records maintained for (3) shall be taken daily as needed. All records maintained shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.3.1, D.3.2, and D.3.3.

- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and

material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of usage each month and logs of the dates of use when using noncompliant coatings;
- (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by use of the following equation to calculate daily volume weighted average:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{\sum \text{coatings } [D_c * O * Q / [1 - W * D_c / D_w]]}{\sum C}$$

D_c = density of coating, lb/gal **D_w** = density of water, lb/gal
O = weight percent organics, % **Q** = quantity of coating, gal/unit
W = percent volume water, % **C** = total of coatings used, gal/unit;

- (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAP emitted for each compliance period.
- (b) The Permittee shall keep records readily accessible of the dimension of the eight (8) waterbased emulsion adhesive storage vessels and an analysis showing the capacity of each storage vessel for the life of the source.
 - (c) Pursuant to 40 CFR 60.445, the Permittee shall maintain the following records:
 - (1) A calendar month record of all coatings used and the results of the manufacturer's formulation data.
 - (2) A calendar month record of the amount of solvent applied in the coating facility.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1, D.3.2, and D.3.3, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) natural gas fired boiler, identified as B-03, with capacity of 10.205 million British thermal units per hour (mmBtu/hr) exhausting to stack B-03.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 6-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the one (1) 10.205 million British thermal units per hour natural gas fired boiler identified as B-03 shall be limited to 0.4478 pounds per million British thermal unit. This limitation was based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBTU/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Compliance Determination Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the particulate matter (PM) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.3 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [326 IAC 12]
[40 CFR 60.40c]**

D.4.4 Record Keeping Requirements

- (a) Pursuant to 40 CFR 60.40c, the Permittee shall record and maintain monthly records of the amounts of fuel combusted for a period of two years following the date of such record for the one (1) 10.205 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, identified as B-03.

D.4.5 Natural Gas Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year for the one (1) 10.205 million British thermal unit per hour (mmBtu/hr) natural gas fired boiler.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Mailing Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-7475-00018
Facility: Source-Wide
Parameter: VOC [326 IAC 2-2]
Limit: Less than two hundred and fifty (250) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Emissions	VOC Emissions	VOC Emissions
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

ERG/MP

cc: File - Hancock County
U.S. EPA, Region V
Hancock County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Avery Dennison
870 West Anderson Boulevard
Greenfield, Indiana 46140**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: 059-7475-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: July 12, 1999

First Administrative Amendment 059-12396, issued on July 18, 2000.
First Significant Source Modification 059-12392, issued on October 27, 2000

Second Administrative Amendment 059-12547	Pages Affected: 2, 3, 3a, 4, 4a, 18-24a, 27a-27e, 32a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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Compliance Determination Requirements

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D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

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Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11] [326 IAC 12]

D.3.6 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

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D.3.9 Reporting Requirements

SECTION D.4 FACILITY CONDITIONS

Emission Limitations and Standards [326 IAC 6-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Compliance Determination Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.3 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.4 Record Keeping Requirements

D.4.5 Natural Gas Fired Boiler Certification

Certification Form

Emergency/Deviation Occurrence Report

Natural Gas Fired Boiler Certification

Quarterly Report Form

Quarterly Compliance Monitoring Report Form

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary pressure sensitive paper coating and laminating operation.

Responsible Official:	John L. Collins
Source Address:	870 West Anderson Blvd., Greenfield, Indiana 46140
Mailing Address:	870 West Anderson Blvd., Greenfield, Indiana 46140
Phone Number:	317-462-1988
SIC Code:	2672
County Location:	Hancock
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) pressure sensitive paper coating operation, constructed in October, 1994, identified as BE-1, with maximum capacity of nine hundred ninety-three (993) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
 - (A) One (1) flow coating operation and one (1) roll coating operation; and
 - (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr).
- (2) Two (2) natural gas fired boilers, constructed in October, 1994, identified as B-01 and B-02, with maximum heat input capacity of 10.205 million British thermal units per hour (mmBtu/hr) each, exhausting to two (2) stacks (B-01 and B-02).
- (3) One (1) pressure sensitive paper coating operation, identified as GF2, with a maximum capacity of 1,500 billion square inches, exhausting to three (3) stacks (E-1, F-1, and G-1) consisting of the following equipment:
 - (A) Two (2) flow coating operations and one (1) roll coating operation;
 - (B) Two (2) natural gas fired drying ovens with a total maximum heat input capacity of 67.86 million British thermal units per hour (mmBtu/hr); and

- (4) One (1) natural gas fired boiler with capacity of 10.205 million British thermal units per hour (mmBtu/hr) exhausting to stack B-03.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each;
- (2) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons;
- (3) Eight (8) 13,000-gallon water-based emulsion adhesive tanks; and
- (4) One (1) 8,000-gallon waste water tank.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

C.8 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total VOC emissions from the entire source shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Compliance with this limit shall be demonstrated using the quarterly report located at the end of this permit.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 10, 1996 with the Part 70 Permit application.
- (b) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

- (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C -Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results.

The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;

- (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the

envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(Advanced Source Modification)

- (1) One (1) pressure sensitive paper coating operation, constructed in October, 1994, identified as BE-1, with maximum capacity of nine hundred ninety-three (993) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
 - (A) One (1) flow coating operation and one (1) roll coating operation; and
 - (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr).

Insignificant Activities

- (IA1) Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each; and
- (IA2) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water, delivered to the coating applicator.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to 40 CFR 60.442, Subpart RR, when the pressure sensitive paper coating operation input Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for each calendar month.

SECTION D.3 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) pressure sensitive paper coating operation, identified as GF2, with a maximum capacity of 1,500 billion square inches, exhausting to three (3) stacks (E-1, F-1, and G-1) consisting of the following equipment:

Two (2) flow coating operations and one (1) roll coating operation;
Two (2) natural gas fired drying ovens with a total maximum heat input capacity of 67.86 million British thermal units per hour (mmBtu/hr); and

This facility also consists of the following insignificant activities:

Eight (8) 13,000-gallon water-based emulsion adhesive tanks;
One (1) 8,000-gallon waste water tank
One (1) 80KW capacity corona treater
One (1) 400-ton capacity cooling tower

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water, delivered to the coating applicator.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to 40 CFR 60.442, Subpart RR, when the pressure sensitive paper coating operation input Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for each calendar month.

D.3.3 New source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, no more than 0.20 kg HAP may be emitted per kg coating solids applied, as calculated on a weighted average basis for all coatings used each calendar month.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for GF2 and any control devices.

Compliance Determination Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 12]

Whenever, the input VOC usage exceeds forty-five (45) megagrams per 12 consecutive month period, the Permittee shall perform VOC testing using the method established in the test protocol. IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1, D.3.2, and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements [326 IAC 12] [40 CFR 60.116b]

(a) To document compliance with Conditions D.3.1, D.3.2, and D.3.3 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1), (2), (4), and (5) shall be taken monthly. Records maintained for (3) shall be taken daily as needed. All records maintained shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.3.1, D.3.2, and D.3.3.

- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of usage each month and logs of the dates of use when using noncompliant coatings;
- (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by use of the following equation to calculate daily volume weighted average:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{\sum \text{coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{\sum C}$$

Dc	=	density of coating, lb/gal	Dw	=	density of water, lb gal
O	=	weight percent organics, %	Q	=	quantity of coating, gal/unit
W	=	percent volume water, %	C	=	total of coatings used, gal/unit;

- (4) The total VOC and HAP usage for each month; and
- (5) The weight of VOCs and HAP emitted for each compliance period.

- (b) The Permittee shall keep records readily accessible of the dimension of the eight (8) waterbased emulsion adhesive storage vessels and an analysis showing the capacity of each storage vessel for the life of the source.
- (c) Pursuant to 40 CFR 60.445, the Permittee shall maintain the following records:
 - (1) A calendar month record of all coatings used and the results of the manufacturer's formulation data.
 - (2) A calendar month record of the amount of solvent applied in the coating facility.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1, D.3.2, and D.3.3, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) natural gas fired boiler, identified as B-03, with capacity of 10.205 million British thermal units per hour (mmBtu/hr) exhausting to stack B-03.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 6-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the one (1) 10.205 million British thermal units per hour natural gas fired boiler identified as B-03 shall be limited to 0.4478 pounds per million British thermal unit. This limitation was based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBTU/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Compliance Determination Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the particulate matter (PM) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.3 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [326 IAC 12]
[40 CFR 60.40(c)]**

D.4.4 Record Keeping Requirements

- (a) Pursuant to 40 CFR 60.40c, the Permittee shall record and maintain monthly records of the amounts of fuel combusted for a period of two years following the date of such record for the one (1) 10.205 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, identified as B-03.

D.4.5 Natural Gas Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year for the one (1) 10.205 million British thermal unit per hour (mmBtu/hr) natural gas fired boiler.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Mailing Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-7475-00018
Facility: Source-Wide
Parameter: VOC [326 IAC 2-2]
Limit: Less than two hundred and fifty (250) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Emissions	VOC Emissions	VOC Emissions
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.